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UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF ALASKA

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| UNITED STATES OF AMERICA, |) NO. A02-0054 CV (JKS) |
| |) |
| Plaintiff, |) MUNGLE DEFENDANTS' REQUEST FOR |
| |) ORAL ARGUMENT ON UNITED STATES' |
| |) MOTION TO CORRECT ORDER AND FOR |
| |) ENTRY OF JUDGMENT AGAINST |
| vs. |) THOMAS R. MUNGLE AND MARLENE C. |
| |) MUNGLE |
| THOMAS R. MUNGLE and MARLENE C. |) |
| MUNGLE; DOWN RIGGER CORP.; |) |
| SIERRA VIEW HOLDING, INC.; ROBERT |) |
| and JOAN DIDIER; INVERSIONES |) |
| QUIZARRRA, S.A.; DAVID ALLISON; |) |
| AND HOWARD JAEGER, |) |
| |) |
| Defendants. |) |

Defendants Thomas R. Mungle and Marlene C. Mungle, by their undersigned counsel and pursuant to D. Ak. LR 7.2(a), state that they believe oral argument on the United States' Motion to Correct Order and for Entry of Judgment Against Thomas R. Mungle and Marlene C.

Mungle would be of assistance to the Court in ruling on the Motion, and hereby request that the Court schedule oral argument on the motion.

DATED this 21st day of December, 2006.

/s/ David S. Grossman
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Attorneys for the Mungle Defendants

CERTIFICATE OF SERVICE

I, David S. Grossman, attorney for Thomas R. Mungle and Marlene C. Mungle, hereby certify under penalty of perjury under the laws of the United States that that service of the foregoing **MUNGLE DEFENDANTS' REQUEST FOR ORAL ARGUMENT ON UNITED STATES' MOTION TO CORRECT ORDER AND FOR ENTRY OF JUDGMENT AGAINST THOMAS R. MUNGLE AND MARLENE C. MUNGLE** has this 21st day of December, 2006, been made upon counsel for the parties as follows:

By filing electronically and service by the Court's ECF system upon:

Goud Pradyumna Maragani
Trial Attorney, Tax Division
U.S. Department of Justice
PO Box 683 Ben Franklin Station
Washington DC 20044

Attorney for Plaintiff United States of America

By U.S. Mail, first-class postage prepaid, addressed to:

Fred J. Baxter
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Pro Se

DATED this 21st day of December, 2006.

/s/ David S. Grossman
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Attorney for Thomas R. Mungle and
Marlene C. Mungle